

**REMARKS**

Claims 1 and 3-15 are pending in this application. By this Amendment, claim 1 is amended. Support for the amendment is found at least at page 7, lines 16-26 and page 10, lines 2-9, of Applicants' specification as originally filed. No new matter is added. A Request for Continued Examination is attached. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Walsh during the telephone interview held September 10, 2008 are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below, which constitute Applicants' record of the interview.

The Office Action rejects claims 1 and 3-15 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,487,566 to Sundaresan. This rejection is respectfully traversed.

Applicants' representative presented the following arguments at the September 10, 2008 telephone interview. The Examiner indicated that the proposed amendment to claim 1 discussed during the telephone interview may overcome the rejection. The Examiner indicated that further review of the applied reference was necessary.

The Office Action, at page 5, in the Response to Arguments section, asserts that the feature, the plurality of possible structural forms comprising text, trees, and graphs, is anticipated by the disclosure of any of text, trees or graphs. Without conceding the propriety of this argument and to further prosecution, claim 1 is amended to remove the term possible.

Claim 1 recites, among other features, wherein the second code structure comprises a plurality of filter characteristics corresponding to a plurality of structural forms of the first code structure, the plurality of structural forms comprising text, trees, and graphs.

The Office Action asserts that Sundaresan discloses the above-recited feature at col. 6, line 67, col. 12, lines 48-49 and col. 3, line 26. Sundaresan fails to disclose or teach any corresponding features to the structural form of graphs in relation to the various recited features of claim 1.

Sundaresan, at col. 6, lines 65-67, discloses that a source pattern represents an intended matching template pattern of an XML tree.

Sundaresan, at col. 12, lines 47-52, discloses transformation rules of XML documents to be performed when a pattern match occurs between a document and a source pattern. Sundaresan, at col. 1, lines 43-52, discloses that documents are made up of storage units called entities containing parsed or unparsed data and have a logical structure, parsed data consisting of characters. The logical structure is constrained by an XML schema. The XML schema provides a description language to say how XML elements are laid out and related to each other. Structure elements and structural forms are distinctly and positively recited in claim 1. It is not reasonable to conclude that logical structure of documents corresponds to both structure elements and structural forms. This description of XML documents having a logical structure of elements neither discloses the structural form of graphs, nor teaches the structural form of graphs can be used in an XML-based pattern matching system, which the Office Action alleges to anticipate the recited features of claims 1.

Sundaresan, at col. 3, lines 23-30, discloses that U.S. Patent 4,447,875 describes a reduction processor for the evaluation of one or more functions which are stored in memory in a tree like graph. The Office Action appears to suggest that this tree like graph corresponds to the structural forms of graphs in relation to the various recited features of claim 1.

Sundaresan discloses that this reduction processor is not a template-based pattern match or pattern match replacement system. The mere mention of an unrelated system that evaluates

functions stored in a memory in a tree like graph cannot reasonably be considered to teach the use of a structural form of graphs in relation to the various recited features of claim 1.

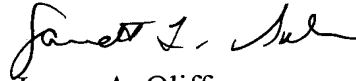
In view of the foregoing, Sundaresan cannot reasonably be considered to teach the second code structure comprises a plurality of filter characteristics corresponding to a plurality of structural forms of the first code structure, the plurality of structural forms comprising text, trees, and graphs. Therefore, Sundaresan does not disclose all of the features recited in claim 1. Further, dependent claims 3-15 are allowable, for at least the respective dependence of these claims on an allowable base claim, as well as the separately allowable subject matter that these claims recite.

Accordingly, rejection and withdrawal of the §102(b) rejection of claims 1 and 3-15 as being anticipated by the applied reference are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-15 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below

Respectfully submitted,



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Attachment:  
Request for Continued Examination

Date: September 15, 2008

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